

DEC 13 2018

JULIA C. DUDLEY, CLERK  
BY: *[Signature]*  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION  
DECEMBER 2018 SESSION

|                           |   |                                 |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA  | ) | Criminal No. 7:18-cr- <i>57</i> |
|                           | ) |                                 |
| v.                        | ) |                                 |
|                           | ) | <b>SEALED INDICTMENT</b>        |
|                           | ) |                                 |
| SHAROCK DEMETRIUS STARKEY | ) | <b><u>In Violation of:</u></b>  |
|                           | ) |                                 |
|                           | ) | 21 U.S.C. § 841(a)(1)           |
|                           | ) | 18 U.S.C. § 924(c)              |
|                           | ) | 18 U.S.C. § 922(g)(1)           |

**COUNT ONE**

The Grand Jury charges:

1. That on or about May 9, 2018, in the Western Judicial District of Virginia, the defendant, SHAROCK DEMETRIUS STARKEY, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWO**

The Grand Jury further charges:

1. That on or about July 3, 2018, in the Western Judicial District of Virginia, the defendant, SHAROCK DEMETRIUS STARKEY, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable

amount of heroin, a Schedule I controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT THREE**

The Grand Jury further charges:

1. That on or about July 17, 2018, in the Western Judicial District of Virginia, the defendant, SHAROCK DEMETRIUS STARKEY, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT FOUR**

The Grand Jury further charges:

1. That on or about July 18, 2018, in the Western Judicial District of Virginia, the defendant, SHAROCK DEMETRIUS STARKEY, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT FIVE**

The Grand Jury further charges:

1. That on or about July 18, 2018, in the Western Judicial District of Virginia, at a time and place different from that of Count Four, the defendant, SHAROCK DEMETRIUS STARKEY, did knowingly and intentionally possess with the intent to distribute a measurable quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT SIX**

The Grand Jury further charges:

1. That on or about July 18, 2018, in the Western Judicial District of Virginia, at a time and place different from that of Count Four, the defendant, SHAROCK DEMETRIUS STARKEY, did knowingly and intentionally possess with the intent to distribute a measurable quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT SEVEN**

The Grand Jury further charges:

1. On or about July 18, 2018, in the Western Judicial District of Virginia, the defendant, SHAROCK DEMETRIUS STARKEY, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, to wit a Romarms model Draco 7.62 caliber pistol, a Smith & Wesson model M&P 40 .40 caliber pistol, a Rossi model R461 .357 caliber revolver, a Sig Sauer model p220 .45 caliber pistol, and an additional Romarms model Draco 7.62 caliber pistol, all of which had previously been shipped and transported in interstate or foreign commerce.

2. All in violation of Title 18, United States Code, Section 922(g)(1).

### **COUNT EIGHT**

The Grand Jury further charges:

1. That on or about April 28, 2018, in the Western Judicial District of Virginia, the defendant, SHAROCK DEMETRIUS STARKEY, knowingly possessed certain firearms, to wit a Romarms model Draco 7.62 caliber pistol, a Smith & Wesson model M&P 40 .40 caliber pistol, a Rossi model R461 .357 caliber revolver, and a Sig Sauer model p220 .45 caliber pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Counts Five and Six of this Indictment.

2. All in violation of Title 18, United States Code, Section 924(c).

## **NOTICE OF FORFEITURE**

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendants shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
- c. any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
- d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. **Money Judgment**

An undetermined sum of United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

b. **Firearms**

- 1) A Romarms model Draco 7.62 caliber pistol, serial # DB-4820-17 RO
- 2) A Smith & Wesson model M&P 40 .40 caliber pistol, serial # DXK2952
- 3) A Rossi model R461 .357 caliber revolver, serial # G0767117

- 4) A Sig Sauer model p220 .45 caliber pistol, serial # 37B003298
- 5) A Romarms model Draco 7.62 caliber pistol, serial # 4167-10 RO
- 6) All ammunition, magazines, and accessories associated with these firearms


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL this 13 day of December, 2018.

s/Grand Jury Foreperson  
FOREPERSON

  
THOMAS T. CULLEN  
UNITED STATES ATTORNEY